

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

David J. Catanzaro,

Plaintiff,

v.

Lykart Technologies LLC, et al.,

Defendants.

Civil Action – Law

Case No.: 3:22-CV-01754-JFS-PJC

Judge Joseph F. Saporito

Judge Phillip J. Caraballo

JURY TRIAL DEMANDED

**UNOPPOSED MOTION OF DEFENDANT TARGET CORPORATION TO
EXTEND TIME TO RESPOND TO PLAINTIFF’S VERIFIED THIRD
AMENDED COMPLAINT**

Defendant Target Corporation (“Target”) moves for an extension of time to respond to Plaintiff’s Verified Third Amended Complaint (“Complaint”) (ECF No. 33), and in support thereof, states as follows:

1. Target was served with the Complaint on February 19, 2025.
2. Target’s response to the Complaint is currently due on or before March 12, 2025.
3. Target desires additional time to prepare and file a responsive pleading or motion.
4. Plaintiff has filed a Motion to Amend and File a Fourth Amended Complaint (ECF No. 49), which is currently pending. Plaintiff has further informed Target that he intends to ask this Court to dismiss the Motion to Amend and File a Fourth Amended Complaint.

5. Plaintiff has filed a Motion for Leave to File a Fifth Amended Complaint (ECF No. 53), which is currently pending.

6. Plaintiff concurs in this request for an extension of time of no later than thirty (30) days from the date the Court issues an Order on Plaintiff's pending Motion for Leave to File a Fifth Amended Complaint (ECF No. 53) for Target to answer, or otherwise respond, to the Complaint.

7. Because Plaintiff concurs in this request and the reasons for the request are fully stated in this motion, no supporting brief is required pursuant to Local Rule 7.5.

8. No party will be prejudiced by this Court granting this extension, and this motion is not being filed for purposes of harassment or delay.

9. This is Target's first request to extend this deadline.

WHEREFORE, Defendant Target Corporation respectfully requests an extension of time of thirty (30) days from the date the Court issues an Order on Plaintiff's pending Motion for Leave to File a Fifth Amended Complaint (ECF No. 53) for Target to answer, move, or otherwise respond to the Complaint.

Dated: March 12, 2025

**FAEGRE DRINKER BIDDLE &
REATH LLP**

By: /s/ Timothy D. Katsiff

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*Attorney for Defendant Target
Corporation*

CERTIFICATE OF CONCURRENCE

The undersigned certifies that counsel for Defendant Target Corporation contacted Plaintiff regarding Plaintiff's concurrence with the foregoing motion. Plaintiff concurs in the requested relief.

Dated: March 12, 2025

**FAEGRE DRINKER BIDDLE &
REATH LLP**

By: /s/Timothy D. Katsiff
Timothy D. Katsiff

*Attorney for Defendant Target
Corporation*

CERTIFICATE OF SERVICE

I certify that on this 12th day of March, 2025, I served a copy of the foregoing **Unopposed Motion of Defendant Target Corporation to Extend Time to Respond to Plaintiff's Verified Third Amended Complaint** upon all counsel and parties of record via this Court's electronic filing system, which service satisfies the requirements of the Federal Rules of Civil Procedure.

Dated: March 12, 2025

**FAEGRE DRINKER BIDDLE &
REATH LLP**

By: /s/ Timothy D. Katsiff
Timothy D. Katsiff

*Attorney for Defendant Target
Corporation*